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Before the
FEDERAL COMMUNICATIONS COMMISSION
 Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
 OFFICE OF THE SECRETARY

In re Applications of)	MM Docket No. 93-37
)	
LEHIGH VALLEY COMMUNITY BROADCASTERS)	FCC File No.
ASSOCIATION, INC.)	BPED-891019MF
Allentown, Pennsylvania)	
)	
BEACON BROADCASTING CORPORATION)	FCC File No.
Allentown, Pennsylvania)	BPED-900905ML
)	
NORTHAMPTON COMMUNITY COLLEGE)	FCC File No.
Bethlehem Township, Pennsylvania)	BPED-900202MC
)	
For Construction Permit for a New)	
Noncommercial, Educational FM Station)	
To: Administrative Law Judge		
Joseph Chachkin		

PETITION FOR LEAVE TO AMEND

The Lehigh Valley Community Broadcasters Association, Inc. (Lehigh), through its attorneys and pursuant to Section 1.65 of the rules hereby requests leave to amend its above-referenced application. This amendment is filed pursuant to the requirement of the Hearing Designation Order (HDO) in this proceeding (DA 93-154, released March 9, 1993, paras. 7, 8).^{1/} It provides information concerning Lehigh's Board of Directors and technical proposal. Under these circumstances, good cause exists for acceptance of this amendment.

^{1/} By the terms of the HDO, this amendment was due by April 8, 1993. The slight one-day omission to file it by that time was entirely inadvertent. No party will be prejudiced by acceptance of the amendment at this time inasmuch as it provides routine information which does not confer any comparative advantage upon Lehigh.

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WHEREFORE, Lehigh respectfully requests the Presiding Judge to grant this Petition and accept the amendment. An original and two copies of the amendment are attached to the original copy of this Petition.

Respectfully submitted,

LEHIGH VALLEY COMMUNITY
BROADCASTERS ASSOCIATION, INC.

By: Malcolm G. Stevenson
Malcolm G. Stevenson

Schwartz, Woods & Miller
Suite 300
1350 Connecticut Avenue, N.W.
Washington, D.C. 20036
(202)833-1700

Its Attorneys



Lehigh Valley Community Broadcasters Association, Inc.

P.O. Box 1456 / Allentown, PA 18105

DONNA R. SEARCY
Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

Re: New Noncommercial Educational Radio Station
Allentown, Pennsylvania
FCC File No. BPED-891019MF

Dear Ms. Searcy;

Please amend the above-referenced application in accordance with the
attached materials.

Respectfully submitted,

LEHIGH VALLEY COMMUNITY
BROADCASTERS ASSOCIATION, INC.

A handwritten signature in cursive script, reading "Charles James", is written over the typed name of the sender.

CHARLES JAMES
President

Date: April 6, 1993

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A M E N D M E N T

This amendment is filed in response to Paragraph 7 of the Hearing Designation Order in this proceeding (DA 93-154) directing the application to provide information responsive to Questions 6, 7 and 9 of FCC Form 340. The applicant's response to Question 6 at all times has been "yes". Its response to Question 7 at all times has been "no", and its response to Question 9 at all times has been "no".

LEHIGH VALLEY COMMUNITY BROADCASTERS

ALLENTOWN, PA

AMENDMENT TO APPLICATION

BPED-891019MF

FOR A NEW

NON-COMMERCIAL EDUCATIONAL FM BROADCAST STATION

AT ALLENTOWN, PA

CHARLES W. LOUGHERY
741 CYBUS WAY
SOUTHAMPTON, PENNSYLVANIA 18966

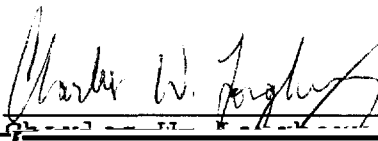
NEW NON-COMMERCIAL FM

ALLENTOWN, PA

DECLARATION

I declare under penalty of perjury, that I have prepared the attached Engineering Amendment for Lehigh Valley Community Broadcasters, applicant for a new non-commercial FM station at Allentown, Pa. and that all the facts therein, except for facts of which the Federal Communications Commission may take official notice, are true to the best of my knowledge and belief.

executed on: 5 April 1993



1. INTRODUCTION

This amendment is submitted in response to the Hearing Designation Order (MM Docket No. 93-37). Specifically, we are amending BPED-891019MF to change, the height of the proposed tower, the Radiofrequency Radiation Study and include a statement concerning FM Translator stations W204AC and W285DB.

2. TOWER HEIGHT AND LOCATION

After meeting with the Chief Engineer of WFMZ concerning the correct height and coordinates of the tower we are able to pro-

from the antenna systems on the above tower as follows:

The proposed New FM station on channel 207 proposes an ERP of 0.12 kilowatts with an antenna 113 meters above the ground.

horizontal polarization. The Channel 46 transmitting antenna is a high gain unit with a power gain of 10x side mounted 38.1 meters up the tower. Because of the high gain, the ERP at angles departing +/- 10 degrees from the horizon is attenuated by a minimum of 10 dB. Utilizing Appendix C, Table 2, with interpolation, the required separation is less than 10 meters. Since the antenna is 38.1 meters above the ground, the height of the structure limits the possible excessive radiation values to at least 26 meters above the ground.

Therefore the total levels of all non-ionizing radiation sources at all points on the ground are below that required for protection of both the employees and the general public as required by ANSI 95.1-1982. The radiofrequency levels do not exceed $1\text{mW}/\text{cm}^2$ anywhere on the ground in the area of the tower. The antenna supporting structure will be enclosed by a chain-link fence to prevent unauthorized access.

As a precaution to employees, a suitable sign will be posted at the base of the tower alerting maintenance personnel to the presence of non-ionizing radiofrequency radiation so that appropriate action can be taken when access on the tower above 26 meters above ground is required.

The other broadcast transmitters co-located on the site are not owned by the applicant. The applicant further states that agreements are in place such that, during periods of maintenance where workers on the tower could be exposed to excessive levels of non-ionizing radiation, any transmitting system that could pose a hazard will be either turned off or reduced in power to insure that workers are not subject to excessive values of non-

ionizing radiation.

With these procedures in place, we believe the proposed FM Channel 207 operation is in compliance with the non-ionizing radiation requirements of 47 CFR 1.1307(b).

4. FM TRANSLATORS W204AC AND W285DB

The transmission line for the proposed channel 207 FM station passes the antenna systems of FM Translator stations W204AC and W285DB as well as the UHF TV Translator station previously discussed. The tower is a Stainless Model G8 which has an eight foot face and 5 inch legs. Lehigh Valley Community Broadcasters will install the transmission line on the tower in a manner which will not disrupt the directional antenna patterns of these Translators. This will be accomplished by locating the line behind one of the 5 inch legs.

CERTIFICATE OF SERVICE

I, Artie King, Secretary in the law office of Schwartz, Woods & Miller, do hereby certify that I have on this 9th day of April 1993 sent by First Class United States mail, postage prepaid, copies of the foregoing **PETITION FOR LEAVE TO AMEND** to the following:

The Honorable Joseph Chachkin *
Administrative Law Judge
Federal Communications Commission
2000 L Street, N.W., #226
Washington, D.C. 20036

Gary Schonman, Esquire *
Hearing Branch, Enforcement Division
Mass Media Bureau
Federal Communications Commission
2025 M Street, N.W., #7212
Washington, D.C. 20036

Larry D. Eads, Chief *
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Southmayd & Miller
1233 - 20th Street, N.W., #205
Washington, D.C. 20036



Artie King

* Hand Delivered